

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

TERESA SABBIE, individually, as personal §
representative of the ESTATE OF MICHAEL §
SABBIE, and as parent and natural guardian §
of her minor children, T.S., T.S., and M.S.; §
SHANYKE NORTON, as parent and natural §
guardian of her minor child, M.S.; § No. 5:17-cv-0113-RWS-CMC
KIMBERLY WILLIAMS; MARCUS §
SABBIE; and CHARLISA CRUMP, §

Plaintiffs, §

v. §

SOUTHWESTERN CORRECTIONAL, LLC §
d/b/a LASALLE CORRECTIONS, LLC and §
LASALLE SOUTHWEST CORRECTIONS; §
LASALLE MANAGEMENT COMPANY, §
LLC; BOWIE COUNTY, TEXAS; the CITY §
of TEXARKANA, ARKANSAS; TIFFANY §
VENABLE, LVN, individually; M. FLINT, §
LVN, individually; GREGORY MONTOYA, §
M.D., individually; CLINT BROWN, §
individually; NATHANIEL JOHNSON, §
individually; BRIAN JONES, individually; §
ROBERT DERRICK, individually; DANIEL §
HOPKINS, individually; STUART BOOZER, §
individually; ANDREW LOMAX, §
individually; SHAWN PALMER, §
individually; SIMONE NASH, individually; §
and JOHN and JANE DOES 1-10, §

Defendants. §

DECLARATION OF EDWIN S. BUDGE

**IN SUPPORT OF THE ESTATE OF MICHAEL SABBIE'S MOTION TO COMPEL
PRODUCTION OF CERTAIN VIDEO EVIDENCE**

EDWIN S. BUDGE hereby declares as follows:

1. I am one of the attorneys for the plaintiffs in the above-captioned matter. I have personal knowledge of the matters stated herein and am otherwise competent to testify thereto.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the May 30, 2018 Deposition of Tiffany Venable.

3. Attached hereto as Exhibit B is a true and correct copy of a record from the Texarkana, Arkansas Police Department summarizing an interview with Tiffany Venable after the death of Michael Sabbie.

4. Attached hereto as Exhibit C is a true and correct copy of excerpts from the May 31, 2018 Deposition of Mia Flint.

5. Attached hereto as Exhibit D is a true and correct copy of a record from the Texarkana, Arkansas Police Department summarizing an interview with an inmate after the death of Michael Sabbie.

6. Attached hereto as Exhibit E is a true and correct copy of the Corporate Defendants' Use of Force Policy.

7. Attached hereto as Exhibit F is a true and correct copy of excerpts from Plaintiff's First Discovery Requests to the Corporate Defendants, and the Corporate Defendants responses.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 16th day of July, 2018 at Seattle, Washington.

/s/ Edwin S. Budge

CERTIFICATE OF SERVICE

This is to certify that on July 16, 2018, a true and correct copy of the above and foregoing document was filed through the court's CM/ECF system and thereby served upon the following counsel of record:

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/s/ Edwin S. Budge
Edwin S. Budge